

EXHIBIT L

Excerpts of Deposition Testimony of Martin Tripp, Karl Hansen and Elon Musk

~~Karl Hansen-Confidential~~

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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REPORTER CERTIFIED
TRANSCRIPT

TESLA, INC., a Delaware
corporation,

Plaintiff,

vs.

MARTIN TRIPP, an individual,

Defendants.

AND RELATED COUNTERCLAIMS

=====

CASE NO.
3:18-cv-00296-LRH-CBC

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VIDEOTAPED DEPOSITION OF KARL HANSEN

Wednesday, September 4, 2019

Reno, Nevada

REPORTED BY:

MICHELLE BLAZER CCR #469 (NV)

CSR #3361 (CA)

FILE NO. 19-29471



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10:17:02 1 accounts.

2 Q Do you know anything about the amount of

3 scrap Tesla was generating at the Gigafactory?

4 A The amount of scrap that they were

10:17:20 5 generating? I have no personal knowledge of the

6 amount as it relates to Mr. Tripp.

7 Q Do you have knowledge about scrap at the

8 Gigafactory otherwise?

9 A I do.

10:17:37 10 As part of my responsibility as an

11 investigator I was tasked to conduct investigative

12 activity related to widespread thefts of scrap, raw

13 material, production materials and other things that

14 resulted in a significant financial loss to Tesla.

10:18:04 15 But I was not assigned any part of the investigative

16 role as it relates to Mr. Tripp, Mr. Tripp's

17 mentioning of scrap numbers associated with that,

18 losses to Tesla financially, or what have you. Any

19 knowledge I have of that was based on my

10:18:28 20 investigations of losses.

21 Also, based on information provided to

22 myself and others in a security operations pre-shift

23 meeting on June 5th wherein Elon Musk, Tesla CFO

24 Deepak, I forgot his last name, Director of Security

10:18:51 25 Operations Jeff Jones, had a telephone conference with

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10:20:28 1 investigations, and that's probably -- that's not even

2 relevant to this matter, but at the end of the day Mr.

3 Gouthro reported to me that his information from Jeff

4 Jones and from folks in the accounting world were that

10:20:47 5 there was excess losses of 100 million-plus dollars.

6 Q Would it be fair to say that -- that your

7 knowledge is about theft of scrap and missing raw

8 materials; is that correct?

9 A Yes.

10:21:01 10 Q But your knowledge is not about the

11 amounts of scrap Tesla was generating?

12 A I would agree with that, yes. That's

13 fair to say.

14 Q And do you have any information about

10:21:14 15 whether -- how Tesla was storing scrap at the

16 Gigafactory complied with all safety regulations?

17 Whether it was maintained safely?

18 A I do have knowledge of that. I know they

19 weren't.

10:21:29 20 Q And what's your knowledge of that?

21 A So my knowledge of the storage of scrap,

22 the storage of lithium batteries, the storage of --

23 I'm not sure of the industry term, but miss --

24 mis-manufactured products or materials, maybe they

10:21:51 25 don't pass a QA inspection or whatnot, there was a

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10:18:51 1 Mr. Gouthro as well as other leadership. Mr. Musk

2 directed that all employees be reminded of the NDAs

3 that they had signed, that there was to be no

4 discussion of any of these concerns.

10:19:12 5 And those concerns were Elon Musk

6 specifically stating that between January and June a

7 figure of \$37 million in raw material was unaccounted

8 for and missing.

9 I became aware of that because Mr.

10:19:31 10 Gouthro, being my supervisor, directed me to

11 previously conduct investigations into these thefts.

12 Additionally, prior conversations with

13 Mr. Gouthro at the onset of those investigations

14 indicated that there were losses and thefts. Now,

10:19:52 15 this is Mr. Gouthro stating thefts in excess of

16 \$100 million, and that this information -- when I

17 asked I said, well, where are these figures coming

18 from? How are we going to account for this? Based on

19 my experience they had been investigating spot thefts

10:20:11 20 here and there, you know onesies and twosies, if you

21 will.

22 And I started to take a look at the

23 overall picture and determined that there was probably

24 a more widespread organized effort with respect to

10:20:28 25 theft. And I'm not going to get into, I guess, my

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10:21:51 1 designated area at the Gigafactory known as the

2 recycle area. Batteries, battery components, battery

3 parts were stored and just thrown in boxes or on

4 certain pallets. They were stored in trailers, and I

10:22:14 5 say cargo van, dry trailers, tractor-trailer vans on

6 various locations on the property. There was an

7 occasion of a fire involving an explosion or a what --

8 what I was told was maybe a gas-off. That's not my

9 level of expertise with respect to lithium batteries,

10:22:37 10 but I did know that they needed to be stored -- I was

11 told by engineering and environmental safety and

12 health personnel that they were concerned because

13 there were literally millions of batteries stored over

14 in an area of the Gigafactory that was under

10:22:52 15 construction. Their concern was that there was hot

16 work going on, and these lithium batteries were there.

17 The environmental health guy told me that

18 he had spoken to people to get these batteries

19 removed. But literally, millions of them. Pallets.

10:23:08 20 As far as the other scrap, there were

21 drive unit parts, battery parts, other various

22 production components that were just rampantly stored

23 outside the back of the gigafactory. It got to a

24 point where a tent was set up or -- and being utilized

10:23:27 25 for materials that there was no more room for.

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10:23:27 1 So that's my -- my knowledge. And inside
2 corridors were blocked. It was -- was not organized,
3 was not orderly, and that's my knowledge of that.
4 Q And is your knowledge based on both your
10:23:48 5 own observations and conversations you had with other
6 employees at the Gigafactory?
7 A Based on my personal knowledge, my
8 observations, and my interactions with Tesla's
9 recycling manager, Mr. Elles, who complained to me
10:24:01 10 when I got -- we got a report of a theft, that he was
11 extremely frustrated that he could not manage this
12 area because there were no SOPs. Tesla had no
13 standard operating procedures, no guidelines, and --
14 and no practical application to organize this scrap
10:24:22 15 and materials and theft.
16 Furthermore, he indicated that this is
17 wide open, used some colorful language, and stated
18 he's tired of these employees just driving up, backing
19 their vehicles in here, grabbing stuff, throwing
10:24:38 20 materials in there, and telling me that then they are
21 taking it down to scrap metal yards.
22 He went into the telling me he's worked
23 in the industry for 20 plus years, he's never seen an
24 operation like this.
10:24:49 25 So that's the basis of my knowledge.

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10:26:25 1 understanding that batteries were to be controlled in
2 a -- I'm sorry, let me start again.
3 It was your understanding that batteries
4 were to be stored in a climate-controlled environment;
10:26:54 5 is that correct?
6 A That is correct.
7 Q And it's your understanding that the --
8 there is millions of batteries, I think you said, that
9 were not stored in the climate-controlled environment;
10:27:06 10 is that correct?
11 A That's correct.
12 Q And how do you know they weren't stored?
13 A I observed them, and I was approached
14 while I was an employee there conducting a security
10:27:14 15 patrol by an environmental safety manager who also was
16 an OSHA instructor, he told me and made it clear that
17 he had spoken to somebody about these batteries, I
18 believe it was over the last -- the preceding couple
19 of days, and that no action had been taken. And that
10:27:33 20 his -- the contractors had hot work permits that --
21 that -- welding hot work, different things like that
22 that needed to be done, and there was a concern that
23 there could be a potentially dangerous situation
24 involving the batteries, hot work, things like that.
10:27:50 25 Q During your time at Tesla was that

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10:24:49 1 Q Do you recall Mr. Elles's first name?
2 A Michael, I believe.
3 Q And do you recall around what time this
4 conversation occurred?
10:24:59 5 A I do not. I do not.
6 Q Was it when you were still an employee?
7 A Yes, it was.
8 Q For -- and I think you mentioned it was
9 batteries and drive units that you saw being stored
10:25:41 10 poorly --
11 A Sure.
12 Q -- at the --
13 A Yeah.
14 Q -- Tesla?
10:25:44 15 Any other types of scrap that you recall?
16 A Absolutely. Different plastics, molded
17 components ultimately used in I want to say the end
18 state assembly of the -- I'll say the Model 3 battery
19 unit itself. When it went through that production
10:26:09 20 line, plastic pieces, electrical wiring harnesses,
21 things like that. Lots of it.
22 So, yeah, I mean, I -- I couldn't
23 specifically tell you what those are called. I -- I
24 don't have that background.
10:26:25 25 Q And concerning the batteries it was your

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10:27:50 1 concern over the batteries and how those batteries
2 were stored, was that ever addressed, to your
3 knowledge?
4 A By who? Was it addressed in what way?
10:28:08 5 Q I'm just wondering if it was corrected.
6 If they were put in a safe place.
7 A I never observed that during my tenure at
8 all. I reported the EHS guys' concerns. What
9 happened after that, I don't know. But I can tell you
10:28:22 10 that I observed nothing changing with respect to that.
11 Q And could you just give me a sense of
12 what you observed of the batteries? How they were
13 stored? Where they were stored?
14 A Sure. Outside the back area, inside
10:28:39 15 cargo vans, dry tractor-trailer vans. The -- the
16 pallets of millions of these battery cells, these
17 individual battery cells were -- I believe they were
18 in D and E quad. I'd -- I'd have to look at a
19 schematic, you know, of the area to -- to be specific
10:28:58 20 on that, but they were definitely in those two modules
21 that were under construction.
22 And those batteries were palletized,
23 wrapped in plastic, various markings on them with
24 respect to date of manufacture.
10:29:18 25 There were also markings that they were

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10:29:18 1 bad cells, return to Panasonic, send to this person,
2 this person, things like that.
3 Additionally out back, individual battery
4 cells. And on the production floor where there were
10:29:34 5 challenges with respect to maybe a production accident
6 or something, these batteries were observed just being
7 thrown in a vat of water, I guess a 30 or 50-gallon
8 drum of water. And I don't know the end state of when
9 they were removed, if they were removed, but during my
10:29:55 10 patrols and investigation into an incident occurring
11 wherein a couple pallets of batteries crashed to the
12 floor, started sparking, caused a little fire up
13 there, my review of the video on that, as well as my
14 inspection of the conveyor and the machine led me to
10:30:17 15 see that there were these drums with water.
16 And during that incident these -- these
17 batteries were being picked up and scooped and dumped
18 into this container of water that was on the
19 manufacturing floor.
10:30:31 20 Out back, same thing. Well, not -- well,
21 there were -- there were, in fact, a couple of those
22 out back against the back of the building during my
23 observations and my tenure where batteries were inside
24 a vat of water. They appeared to have been there for
10:30:46 25 an extended period of time.

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10:32:05 1 Gigafactory. Also, Tesla has off-site warehouses out
2 there, and there are trailers at -- cargo trailers
3 that are around these warehouses that are also filled
4 with various scrap materials and batteries, and I
10:32:28 5 would say -- and I -- I know five. I would say that
6 there was approximately two more that I observed
7 during another investigation in looking for some
8 missing property over at those warehouses.
9 Q So there are five trailers at the
10:32:43 10 gigafactory, and you saw two more at off-site
11 warehouses; is that correct?
12 A That's -- yes. Yes. I'll agree to that.
13 Q And the off-site trailers, those were
14 also not temperature-controlled; is that correct?
10:32:58 15 A That is correct.
16 Q And about how big were the trailers?
17 A They were 53-foot dry cargo dry vans. I
18 believe approximately 53. I think that's what the
19 overall length is.
10:33:12 20 Q And about how many pallets do you recall
21 seeing of batteries stored at the Gigafactory?
22 A Are you referring to the D and E mod?
23 Q Yes. Well, just that you saw that you
24 thought were unsafe -- was unsafe storage of batteries
10:33:29 25 by being maintained on those pallets.

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10:30:46 1 And the trailers, the tractor-trailers
2 where you had -- again, I don't know the term, but you
3 had a, I don't know, probably a 12-inch by eight-foot
4 whatever unit module or -- or even more assembled -- a
10:31:12 5 bigger assembly units that were stacked in
6 tractor-trailers, like I say, in different areas. An
7 area known as the boneyard, there were several old
8 tractor-trailers over there. Scrap steel, scrap
9 metal, a whole bunch of things.
10:31:26 10 So those are my observations.
11 Q Do you know if the cargo trailers were
12 temperature-controlled?
13 A They were not.
14 Q And how do you know that?
10:31:35 15 A I have a commercial driver's license, and
16 I'm aware of what those trailers look like, and they
17 were not temperature-controlled trailers.
18 Q About how many --
19 A And there was no electric over there, so
10:31:47 20 even -- how many trailers?
21 Q Let me ask it again.
22 And can you estimate how many trailers
23 you saw with batteries?
24 A Yes. I am aware of five individual
10:32:05 25 trailers at different locations around the

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10:33:29 1 A Hundreds. Between -- I -- I --
2 between 100 and 200, based on my recollection right
3 now, and looking at those rows and remembering, you
4 know, how many were in those rows, definitely between
10:33:57 5 100 and 200 at a minimum.
6 Q And you said those were stored in the D
7 and E quad; is that correct?
8 A I believe they were D and E quad, yes.
9 Q And you mentioned one incident where you
10:34:14 10 are aware of that the -- some batteries fell over and
11 there was some sparking; is that correct?
12 A Yeah. Caused a small fire, correct.
13 Very, very small.
14 Q Is that -- is that the only incident you
10:34:26 15 recall with the batteries?
16 A I was -- I observed a video of a battery
17 exploding, and then that was during a review of
18 another investigation and a discussion we had after
19 that particular incident, in fact, and the volatility
10:34:40 20 of these battery cells.
21 Additionally, I'm -- I was made aware of
22 an explosion, if you will, by battery cells that were
23 in one of those vats of water behind the Gigafactory
24 that caused a small fire back there. I did not
10:34:58 25 personally observe that. That was information told to

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10:34:58 1 me by Mr. Gouthro, as well as Mr. Halliday and others
2 that had been part of the investigative team during
3 that time.
4 Q So if I have that right those are three
10:35:19 5 separate instances?
6 A Yes. Yeah.
7 Q So you mentioned you observed security
8 footage of a battery exploding. Can you describe what
9 you observed?
10:35:35 10 A Yeah. I observed video surveillance, I
11 guess surveillance footage of a vehicle that ran over
12 a battery cell in one of the parking lots that
13 exploded and shot through the air ultimately. That
14 was my observation on that.
10:35:57 15 Q So the battery was just sitting on kind
16 of the -- like the parking lot; is that accurate?
17 A That is accurate.
18 Q And do you know how it got there?
19 A I have no idea, no.
10:36:06 20 Q And then the other incident was a -- I
21 think you said that the -- a pallet crashed, and --
22 A Well, there were, like, I think three or
23 four pallets on -- on the pro -- say the production --
24 production conveyor system. In the area I think it
10:36:31 25 was A mod, A module, where the -- the initial assembly

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10:37:47 1 Q And do you --
2 A And that was information I was told by
3 the supervisor. I was tasked to look into that with
4 Mr. Gouthro, Mr. Halliday, the -- Tesla's engineering
10:38:01 5 team came down because they were concerned about this,
6 they didn't know how this could have happened. I was
7 asked to go up and conduct an investigation into this,
8 review footage. Because employees had been
9 identified, as -- as it was explained to me, in an
10:38:16 10 effort to speed a process or somehow -- I believe it
11 was speed a process. But anyway, they would -- they
12 would at times put tape over sensors on -- on these
13 things, and that tape, obviously, over a sensor would
14 prevent the -- the operation of the machine as it's
10:38:41 15 designed to do.
16 That investigation was ultimately handled
17 by -- by somebody else.
18 Q And are you aware of a similar incident
19 occurred again at the -- at the Gigafactory where
10:39:02 20 batteries fell over or sparked? That kind of thing?
21 A I'm not personally aware, but I have
22 heard that it happens, and it happened on several
23 other occasions.
24 Actually, I am. I am aware of one, yes.
10:39:17 25 In fact, it may have -- I don't know if it was that

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10:36:31 1 of the battery units started. And so yes, that's what
2 I observed. Several of those. Just the machine
3 apparently starting by itself, and pushing these right
4 off on to the floor.
10:36:54 5 Q What kind of machine was it?
6 A I don't know the name of it. It's part
7 of the manufacturing and production conveyor system,
8 if you will, where pallets are brought in by these
9 remote vehicles. I say pallets. I don't even know if
10:37:08 10 that's an accurate term, but they are like a tray,
11 stacked individual trays with 140 something individual
12 different battery cells, they are stacked 30 high, and
13 they go through the process, you know, down the
14 conveyor belt ultimately to whatever end -- end use
10:37:25 15 area.
16 I'm not -- I don't know the production
17 role. So -- but that's what I observed. Conveyor
18 system, if you will, is what it appeared to me to be.
19 Q And then the -- your understanding is
10:37:37 20 that the conveyor system in some way malfunctioned
21 causing the batteries to fall and sparking which led
22 to a fire?
23 A That's correct. That's correct.
24 Q And was anyone hurt within the fire?
10:37:47 25 A To my knowledge, no. No.

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09:51 1 Q. How should you be viewed then?

09:51 2 A. Preferably not viewed at all.

09:51 3 Q. All right. You wanted to remain anonymous.

09:51 4 A. That is correct.

09:51 5 Q. You wanted to continue with your job at

09:51 6 Tesla while continuing to provide information to

09:51 7 reporters.

09:51 8 A. Only if it was necessary.

09:51 9 Q. And you were going to do that for as long

09:51 10 as you thought it was necessary.

09:51 11 A. Yes.

09:51 12 Q. As determined by you.

09:51 13 A. Yes.

09:51 14 Q. So you thought by changing -- by -- excuse

09:51 15 me. Let me start that again.

09:51 16 You thought by sharing information with

09:51 17 Linette Lopez, you would change the -- what was

09:52 18 being done at the Tesla Gigafactory; right?

09:52 19 A. That was my hope.

09:52 20 Q. And you were going to continue to provide

09:52 21 information from Tesla to Linette Lopez as long as

09:52 22 it was -- you thought there were things that needed

09:52 23 to be changed at Tesla's Gigafactory.

09:52 24 A. If it involved public safety, yes.

09:52 25 Q. So a lot of the information that you

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09:53 1 A. Not to my knowledge.

09:53 2 Q. You also disclosed to her information about

09:53 3 the number of Model 3s that were being produced.

09:53 4 Do you remember that?

09:53 5 A. Yes.

09:53 6 Q. Was that an issue of public safety?

09:53 7 A. I can't say that it is.

09:53 8 Q. Why did you disclose it to Linette Lopez?

09:53 9 A. Because Elon Musk was lying to investors and

09:54 10 the public about the amount of cars being produced

09:54 11 per day, and I was showing proof of that.

09:54 12 Q. Okay. Let's suppose that you thought the

09:54 13 numbers that you were being put to the public were

09:54 14 incorrect. Why go to a reporter with Tesla

09:54 15 confidential information? What's the importance of

09:54 16 that?

09:54 17 A. I believed it was wrong. I, myself, was an

09:54 18 investor with restricted stock units, and I believe

09:54 19 that it was wrong for him to say one thing, and we

09:54 20 were actually doing another.

09:54 21 Q. So because you thought it was wrong, it was

09:54 22 okay to steal Tesla confidential information and

09:54 23 provide it to a reporter.

09:54 24 A. Correct.

09:54 25 Q. Did you raise the issue of the number of

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09:52 1 disclosed had to do with the amount of dollar value

09:52 2 of scrap. Do you remember that?

09:52 3 A. Yes.

09:52 4 Q. How is that an issue of public safety?

09:52 5 A. I can't say that it is.

09:52 6 Q. Then why were you disclosing it to Linette

09:52 7 Lopez?

09:52 8 A. Because there was a concern internally

09:52 9 amongst many employees.

09:52 10 Q. Okay. So there was a concern internally

09:52 11 amongst employees, and you didn't see it was

09:52 12 changing to your liking; right?

09:52 13 MR. FISCHBACH: Object to the form of the

09:53 14 question.

09:53 15 THE WITNESS: It was not changing to the

09:53 16 liking of anyone.

09:53 17 Q. BY MR. GATES: You didn't think that Tesla

09:53 18 was changing sufficiently in response to the

09:53 19 concerns about the level of scrap.

09:53 20 A. That is correct.

09:53 21 Q. And so because of that, you decided to

09:53 22 provide Tesla confidential information to Linette

09:53 23 Lopez.

09:53 24 A. Yes.

09:53 25 Q. But that's not an issue of public safety.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TESLA, INC., a Delaware
corporation,)

Plaintiff,)

v.)

MARTIN TRIPP, an)
individual,)

Defendant.)

MARTIN TRIPP, an)
individual,)

Counterclaimant,)

v.)

TESLA, INC., a Delaware)
corporation,)

Counterdefendant,)

Case No.
3:18-CV-00296-LRH-CBC

CONFIDENTIAL

Videotaped Deposition of Elon Musk

Los Angeles, California

Friday, February 21, 2020

Michael P. Hensley, RDR, CSR No. 14114

1 you supported -- or that you submitted in opposition to
 2 your deposition?
 3 A. I suppose it was.
 4 Q. All right. Did you read this before you signed
 5 it?
 6 A. Yeah.
 7 Q. Is everything in this declaration true?
 8 A. I certainly believed it to be true. Do you want
 9 me to read it in detail?
 10 Q. I do not, Mr. Musk.
 11 A. Yeah.
 12 Q. I want to ask you, however, why this deposition
 13 would pose a substantial burden and hardship to you in
 14 this case.
 15 A. Well, I have a lot of obligations to run two
 16 companies and make sure that the right thing happens
 17 there. This case, in my view, is a frivolous case
 18 brought by a counterparty who is just a terrible human
 19 being. And, frankly, if I may say so, I -- I'm troubled
 20 by your association with him.
 21 So instead of me being able to do my duty for
 22 the companies, I'm here. This is not -- this is not --
 23 this is not -- does not serve anyone. It's not good.
 24 It's a waste of time.
 25 Q. I think you knocked your microphone down,

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1 Q. And it references something called "NCM", is
 2 that right?
 3 A. Yes.
 4 Q. NCM is shorthand for nonconforming material?
 5 A. Yes.
 6 Q. In other words, scrap; correct?
 7 A. Yes.
 8 Q. And the gist of this email is that Mr. Tripp is
 9 expressing concern to you regarding scrap in the
 10 Gigafactory; correct?
 11 A. Yes.
 12 Q. Does Tesla encourage the practice of its
 13 employees reaching directly out to the CEO if they see
 14 something that concerns them?
 15 A. I do.
 16 Q. In May of 2018 was the amount of scrap at the
 17 Gigafactory a serious concern for you?
 18 A. Yes.
 19 Q. Did you do anything in response to Mr. Tripp's
 20 email?
 21 A. I -- I don't recall exactly what I did, but I
 22 wanted to -- like, I forwarded it on to have it be
 23 looked into.
 24 (Exhibit 4 was marked for identification.)
 25 MR. FISCHBACH: 4?

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1 Mr. Musk.
 2 A. Yeah.
 3 Q. Thank you.
 4 THE VIDEOGRAPHER: Mr. Musk, if it could be on
 5 your jacket, please.
 6 THE WITNESS: Yeah.
 7 THE VIDEOGRAPHER: Thank you, sir.
 8 BY MR. FISCHBACH:
 9 Q. And, sir, if I understand you correctly, time is
 10 a very precious commodity for you, given the
 11 responsibilities you have to these various companies; is
 12 that true?
 13 A. Yes. This is -- I have a lot of responsibility,
 14 and it's critical to execute that responsibility. If I
 15 am constantly deposed in cases that lack merit, as I
 16 view this one to be --
 17 MR. FISCHBACH: May I have that marked, please?
 18 (Exhibit 3 was marked for identification.)
 19 BY MR. FISCHBACH:
 20 Q. Sir, the court reporter has handed you what has
 21 been marked as deposition Exhibit 3. That is an email
 22 sent from Martin Tripp to you on May 16th of 2018.
 23 The title of this email is "Stator Scrap Pareto
 24 (Month of April)"; correct?
 25 A. Yes.

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1 MR. SPIRO: Copy for me?
 2 MR. FISCHBACH: That is your copy.
 3 BY MR. FISCHBACH:
 4 Q. Sir, the court reporter has handed you what has
 5 been marked as deposition Exhibit 4. This is an email
 6 originally from Mr. Tripp to you on June 10th and then a
 7 response from you to Mr. Tripp.
 8 And in this email, you state "Getting scrap from
 9 when cells exit Panasonic to less than 1 percent needs
 10 to be a hardcore goal."
 11 Did you actually write that?
 12 A. Yeah.
 13 Q. And when you say something, do you mean it?
 14 A. Almost always.
 15 Q. Okay. Well, should Tesla employees believe you
 16 when you make a statement like that?
 17 A. Yes.
 18 Q. So Mr. Tripp should have believed you when you
 19 stated that getting scrap down to 1 percent is a
 20 hardcore goal for the company?
 21 A. Of course.
 22 Q. Did you do anything in response to this email to
 23 meet that hardcore goal?
 24 A. We did many things, and we have achieved it. No
 25 thanks to Tripp.

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